

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TERRY HARRIS, et al.,

Plaintiffs,

VS.

JOSEPH BORG,

Defendant.

CASE NO. 2:05-CV1083

AFFIDAVIT IN SUPPORT OF CLASS CERTIFICATION

STATE OF ALABAMA
COUNTY OF JEFFERSON

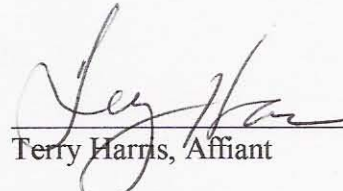
Before me the undersigned notary in and for said state and county personally appeared
Terry Harris, who being known to me and being duly sworn under oath that the following facts
are true and correct:

1. I am Terry Harris, plaintiff in the above action and a member of Wealth Builders International, Inc.

2. Attached as Exhibit A is a membership list of approximately 980 other Wealth Builders International members who suffered loss at the hands of defendant.

3. When the defendant ordered me to liquidate the Wealth Builders International account on April 18, 2005, and issued his cease and desist order, on or about June 10, 2005, he caused a substantial loss in the common pool of funds owned by each member of Wealth Builders International.

4. The loss to some members is small, but the total loss approximates \$1,600,000.00.
5. Defendant's action affected each member in like manner.
6. My claim for damages is typical of the claims of other members.
7. My claim is common to those of other members.
8. Further Affiant sayeth not.


Terry Harris, Affiant

Sworn to and subscribed by me this 22nd day of September, 2006.


NOTARY PUBLIC

My Commission Expires: 03/13/2007